

Mr. Richard Carpenter  
Honeywell International, Inc.  
3520 Westmoor Street  
South Bend, IN 46628

Re: **141-10759-00172 and 141-11205-00172**  
Significant Source Modification No:  
**141-13853-00172**

Dear Mr. Carpenter:

Honeywell International, Inc. applied for a Part 70 operating permit (T-141-7442-00005) on December 10, 1996, for an aircraft landing system manufacturing operation. An application to modify the source was received on February 2, 2001. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) One (1) chemical vapor deposition (CVD) unit, also known as carbon vapor deposition unit, identified as CVD-1, having an estimated batch capacity of 2400 pounds (initial weight) of brakes and a total reactant gas flow rate of 360 scf per soak hour. One (1) enclosed flare, controlling the soak phase VOC emissions from CVD-1, with a rated capacity of 0.9 million British units per hour, natural gas combustion, and emissions exhausted through stack S-FL-1.
- (b) Twenty (20) chemical vapor deposition (CVD) units, also known as carbon vapor deposition units, identified as CVD-2 through CVD-21, with each unit having an estimated batch capacity of 8800 pounds (initial weight) of brakes for random fiber process or 5300 pounds (initial weight) of brakes for non-woven process, and a nominal total reactant gas flow of 2000 scf per soak hour for random fiber process or a nominal total reactant gas flow of 4200 scf per soak hour for non-woven fiber process.
- (c) Twenty (20) enclosed flares, controlling the soak phase VOC emissions from CVD units 2 - 21, with each unit having a rated capacity of 5.5 million British thermal units per hour, natural gas combustion, and emissions exhausted through stacks S-FL-2 through S-FL-21.

This significant source modification authorizes construction of the new emission units. Operating conditions will be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.  
If you have any questions on this matter call (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

SDF

cc: File - St. Joseph County  
St. Joseph County Health Department  
Northern Regional Office  
St. Joseph County Regional Office  
Air Compliance Section Inspector: Rick Reynolds  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR QUALITY**

**Honeywell International, Inc.  
3520 Westmoor Street  
South Bend, Indiana 46628-1373**

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR Part 52.780, with conditions listed on the attached pages.

Source Modification No.: 141-13853-00172	Affected Pages: 141-10759-00172: All Pages 141-11205-00172: All Pages
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 7, 2001

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## SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and St. Joseph County Local Agency. The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information

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The Permittee owns and operates an aircraft landing system manufacturing operation.

Responsible Official:	Adriane Brown
Source Address:	3520 Westmoor Street, South Bend, Indiana 46628-1373
Mailing Address:	3520 Westmoor Street, South Bend, Indiana 46628-1373
SIC Code:	3728
County Location:	St. Joseph
County Status:	Maintenance attainment for ozone, attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program

### A.2 Emission Units and Pollution Control Equipment Summary

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The source is hereby authorized to construct the following emission units and pollution control devices:

- (a) One (1) chemical vapor deposition (CVD) unit, also known as carbon vapor deposition unit, identified as CVD-1, having an estimated batch capacity of 2400 pounds (initial weight) of brakes and a total reactant gas flow rate of 360 scf per soak hour. One (1) enclosed flare, controlling the soak phase VOC emissions from CVD-1, with a rated capacity of 0.9 million British units per hour, natural gas combustion, and emissions exhausted through stack S-FL-1.
- (b) Twenty (20) chemical vapor deposition (CVD) units, also known as carbon vapor deposition units, identified as CVD-2 through CVD-21, with each unit having an estimated batch capacity of 8800 pounds (initial weight) of brakes for random fiber process or 5300 pounds (initial weight) of brakes for non-woven process, and a nominal total reactant gas flow of 2000 scf per soak hour for random fiber process or a nominal total reactant gas flow of 4200 scf per soak hour for non-woven fiber process.
- (c) Twenty (20) enclosed flares, controlling the soak phase VOC emissions from CVD units 2 - 21, with each unit having a rated capacity of 5.5 million British thermal units per hour, natural gas combustion, and emissions exhausted through stacks S-FL-2 through S-FL-21.

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because it is a major source, as defined in 326 IAC 2-7-1(22)).

### A.4 Prior Permit Conditions Superseded [326 IAC 2]

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The terms and conditions of this permit supersede all terms and conditions in permits 141-11205-00172 and 141-10759-00172.

## **SECTION B                      GENERAL CONSTRUCTION CONDITIONS**

### **B.1      Definitions [326 IAC 2-7-1]**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### **B.2      Effective Date of the Permit [IC13-15-5-3]**

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Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

### **B.3      Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.4      Significant Source Modification [326 IAC 2-7-10.5(h)]**

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This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

- (a)      The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
  - (1)      If the affidavit of construction verifies that the emission units and flares were constructed as proposed in the application, then the emission units and flares covered in this Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM.
  - (2)      If the affidavit of construction verifies that actual construction of the emissions units and flares differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (b)      If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c)      Upon receipt of an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d)      In the event that the Part 70 application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:
  - (1)      If the Part 70 draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Part 70 draft.

- (2) If the Part 70 permit has gone through final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go through a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Part 70 permit at the time of issuance.
- (3) If the Part 70 permit has gone through public notice, but has not gone through final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Part 70 permit, and the Title V permit will issued after EPA review.

#### B.5 Local Agency Requirement

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An application for an operation permit must be made ninety (90) days before start up to:

St. Joseph County Local Agency  
City County Building, Room 914  
South Bend, IN 46601-1870

The operation permit issued by St. Joseph County Local Agency shall contain as a minimum the conditions in the Operation Conditions section of this permit.



## SECTION C GENERAL OPERATION CONDITIONS

### C.1 Certification ~~[326 IAC 2-7-4(f)]~~~~[326 IAC 2-7-6(1)]~~~~[326 IAC 2-7-5(3)(C)]~~

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### C.2 Preventive Maintenance Plan ~~[326 IAC 2-7-5(1),(3) and (13)]~~ ~~[326 IAC 2-7-6(1) and (6)]~~ ~~[326 IAC 1-6-3]~~

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015, and

St. Joseph County Local Agency  
City County Building, Room 914  
South Bend, IN 46601-1870

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs, as required by 326 IAC 1-6-3, shall be submitted to IDEM, OAQ, and St. Joseph County Local Agency upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and St. Joseph County Local Agency. IDEM, OAQ, and St. Joseph County Local Agency may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or St. Joseph County Local Agency makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or St. Joseph County Local Agency within a reasonable time.

**C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) 326 IAC 2-7-11 or 326 IAC 2-7-12 shall govern whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015, and

St. Joseph County Local Agency  
City County Building, Room 914  
South Bend, IN 46601-1870

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**C.4 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015, and

St. Joseph County Local Agency  
City County Building, Room 914  
South Bend, IN 46601-1870

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.8 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]**

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- (a) All required compliance testing shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015, and

St. Joseph County Local Agency  
City County Building, Room 914  
South Bend, IN 46601-1870

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and St. Joseph County Local Agency within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and St. Joseph County Local Agency, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

## **Compliance Requirements [326 IAC 2-1.1-11]**

### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

## **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

### **C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

### **C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

- (a) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

## **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

### **C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found.

The elements of the compliance monitoring plan are:

- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ, and St. Joseph County Local Agency upon request and shall be subject to review and approval by IDEM, OAQ, and St. Joseph County Local Agency. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

**C.14 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and St. Joseph County Local Agency within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Office of Air Quality:

(A) Telephone Numbers:

1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or  
317-233-5674 (ask for Compliance Section)

(B) Facsimile Number: 317-233-5967

Local Agency:

(A) Telephone Number: 219-235-9775  
(B) Facsimile Number: 219-235-9497

Northern Regional Office:

- (A) Telephone Numbers: 1-800-753-5519  
219-245-4870
- (B) Facsimile Number: 219-245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015, and

St. Joseph County Local Agency  
City County Building, Room 914  
South Bend, IN 46601-1870

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, and St. Joseph County Local Agency may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, and St. Joseph County Local Agency by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.



- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.16 Monitoring Data Availability**

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- (a) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, as required by Section D Compliance Monitoring and Record Keeping Requirements, reasons for this must be recorded.

- (b) At its discretion, IDEM may excuse such failures providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (c) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.17 Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants (as that term is defined at 326 IAC 2-7-1(32)) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015, and

St. Joseph County Local Agency  
City County Building, Room 914  
South Bend, IN 46601-1870
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or St. Joseph County Local Agency makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or St. Joseph County Local Agency within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015, and

St. Joseph County Local Agency  
City County Building, Room 914  
South Bend, IN 46601-1870

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and St. Joseph County Local Agency on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## SECTION D.1 FACILITY OPERATION CONDITIONS - CVD Units

- (a) One (1) chemical vapor deposition (CVD) unit, also known as carbon vapor deposition unit, identified as CVD-1, having an estimated batch capacity of 2400 pounds (initial weight) of brakes and a total reactant gas flow rate of 360 scf per soak hour. One (1) enclosed flare, controlling the soak phase VOC emissions from CVD-1, with a rated capacity of 0.9 million British units per hour, natural gas combustion, and emissions exhausted through stack S-FL-1.
- (b) Twenty (20) chemical vapor deposition (CVD) units, also known as carbon vapor deposition units, identified as CVD-2 through CVD-21, with each unit having an estimated batch capacity of 8800 pounds (initial weight) of brakes for random fiber process or 5300 pounds (initial weight) of brakes for non-woven process, and a nominal total reactant gas flow of 2000 scf per soak hour for random fiber process or a nominal total reactant gas flow of 4200 scf per soak hour for non-woven fiber process.
- (c) Twenty (20) enclosed flares, controlling the soak phase VOC emissions from CVD units 2 - 21, with each unit having a rated capacity of 5.5 million British thermal units per hour, natural gas combustion, and emissions exhausted through stacks S-FL-2 through S-FL-21.

The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

### D.1.1 BACT Condition [326 IAC 8-1-6]

Enclosed flares have been accepted as BACT for control of the VOC emissions from CVD units 1 - 21. All exhaust process gas from the soak phase of each CVD unit's cycle shall be directed through the enclosed flares for VOC control. Each enclosed flare shall operate at all times that the corresponding CVD unit is operating in the soak phase and shall achieve an overall control efficiency of 98% with a maximum VOC emission rate of 0.23 pounds of VOC per million British thermal units (MMBtu) of process gas combusted by the flares. This limitation is equivalent to 25.09 tons VOC emitted per year from CVD units 1 - 21 combined, based on average heat content of the process gases being 713 Btu per cubic foot for CVD units 1 - 21 and the maximum reactant gas inputs for each unit.

### D.1.2 Prevention of Significant Deterioration (PSD) Minor Source Limit [326 IAC 2-2]

The carbon monoxide emissions from the enclosed flares for CVD units 1 through 21, shall be limited to 1.62 pounds per hour, each, based on maximum soak phase operation of 5800 hours per year for the non-woven process. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

### D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the control devices of these facilities.

## Compliance Determination Requirements

### D.1.4 Testing Requirements [326 IAC 2-1-3]

Compliance stack tests shall be performed utilizing methods and protocols deemed acceptable by the Office of Air Quality.

All required testing shall be conducted in accordance with Section C- Performance Testing.

## Compliance Monitoring Requirements

### D.1.5 Monitoring

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To assure compliance with Conditions D.1.1 and D.1.2:

- (a) The input rate of total reactant gas to each CVD unit shall be measured once per day over the entire batch cycle. To monitor the volatile organic compound (VOC) load to the control flare, the Permittee shall record the number and type of brake discs per batch.
- (b) Each enclosed flare shall have a flame present at all times that its respective CVD unit is operating in the soak phase. A thermocouple or equivalent device shall be installed and operated to monitor the presence of a pilot flame for each flare and to sound an alarm when the flame is not detected. For each CVD unit operating the non-woven process, the flare shall maintain, at a minimum, the operating temperature determined in the most recent approved stack test(s) to achieve compliance with the limits established in Conditions D.1.1 and D.1.2. In addition, a continuous monitoring system shall be installed and operated to monitor and record the operating temperature of the flare. This system shall be accurate to  $\pm 5.0$  percent and capture temperature data at least once every fifteen (15) minutes. If the operating temperature of the flare for a CVD unit operating the non-woven process drops below the minimum operating temperature, the Permittee shall take and document response steps to return the operating temperature to the required minimum level. In the event that a breakdown of the monitoring equipment occurs, the Permittee shall supplement monitoring with visual checks once per hour to ensure that a flame is present.
- (c) The Permittee shall include in its PMP a maintenance program to inspect regularly the thermocouples or equivalent devices for monitoring and recording the presence of a pilot flame, to conduct routine maintenance and calibration on such monitors, and to initiate and record appropriate response steps in the event that the monitor fails.
- (d) Pursuant to 326 IAC 3-5-1(d)(1), the Permittee shall install, calibrate, certify, operate, and maintain a continuous monitoring system for CO on the CVD-21 flare stack designated as S-FL-21 in accordance with 326 IAC 3-5-2 and 3-5-3.
  - (1) The continuous emission monitoring system (CEMS) shall measure CO emission rates in pounds per hour and parts per million (ppmvd).
  - (2) The CEMS shall be in operation at all times when the CVD-21 unit is operating in the soak phase.
  - (3) The Permittee shall submit to IDEM, OAQ, within ninety (90) days after monitor installation, a complete written continuous monitoring standard operating procedure (SOP), in accordance with the requirements of 326 IAC 3-5-4.

## Record Keeping and Reporting Requirements

### D.1.6 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain a record of the total reactant gas input to the CVDs and a log of the number and type of brake discs per batch run.

- (b) To document compliance with Condition D.1.5, the Permittee shall maintain flare temperature data for CVD units operating the non-woven process and records of response steps taken as a result of operating temperature readings below the minimum operating temperature of the flares for these units.
- (c) To document compliance with Condition D.1.5(d), the Permittee shall record the output of the CEMs and shall perform the required record keeping pursuant to 326 IAC 3-5-6, and reporting pursuant to 326 IAC 3-5-7.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.7 Reporting Requirements

The Permittee shall submit a quarterly excess emissions report, if applicable, based on the continuous emissions monitor (CEM) data for CO, pursuant to 326 IAC 3-5-7. These reports shall be submitted within thirty (30) calendar days following the end of each calendar quarter and in accordance with Condition C.18 - General Reporting Requirements of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION  
CERTIFICATION**

Source Name: Honeywell, International, Inc.  
Source Address: 3520 Westmoor Street, South Bend, Indiana 46628  
Mailing Address: 3520 Westmoor Street, South Bend, Indiana 46628  
Source Modification No.: 141-13853-00172

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**Indiana Department of Environmental Management  
Office of Air Quality and  
St. Joseph County Local Agency**

**Technical Support Document (TSD) for a Significant Source  
Modification to a Part 70 Operating Permit**

**Source Background and Description**

Source Name:	Honeywell International, Inc.
Source Location:	3520 Westmoor Street, South Bend, Indiana 46628-1373
County:	St. Joseph
SIC Code:	3728
Operation Permit No.:	141-7442-00172
Issuance Date:	Pending
Source Modification No.:	141-13853-00172
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed a source modification application received on February 2, 2001, from Honeywell, Inc., requesting modifications to permits 141-11205-00172, issued on October 20, 1999 and 141-10759-00172, issued on October 19, 1999, to allow chemical vapor deposition (CVD) units 1, 2, 3, 7, 8, 9, and 11 to operate as non-woven carbon brake processes in addition to the currently permitted random fiber carbon brake processing.

**History**

On December 14, 1998, the Office of Air Quality issued a construction permit (CP 141-9999-00172) to Allied Signal, Incorporated. This permit covered the construction and operation of twenty (20) internal flares to control volatile organic compounds (VOC) from the twenty (20) existing carbon vapor deposition (CVD) units associated with the existing aircraft wheel and brake manufacturing operation. The flares were installed as an alternative to the turbine control system permitted under CP 141-8761-00172, issued on July 2, 1998. In addition, the permit approved the modification of one of the smaller CVD units (CVD-2) to increase its capacity. For the purposes of review of the new facilities under Prevention of Significant Deterioration (PSD), CVD units 15 through 20 originally permitted under CP 141-8761-00172 were also included.

On December 28, 1998, Allied Signal submitted a petition for review of CP 141-9999-00172. This petition resulted in permit (CP 141-11205-00172), issued on October 20, 1999, which revised some permit language as part of the resolution to the petition, revised the equipment descriptions and limitations for several CVD units, and provided for the removal of electric carbonization furnaces (ECF-4 and ECF-5), as requested by the source. Six CVD units (1, 3, 7, 8, 9, and 11) were limited to operating the random fiber process only. The new carbon monoxide (CO) emission rate limit for the CVD units which can run the non-woven process (4, 5, 6, 10, and 12 through 20) was established at 2.41 pounds per hour, each.



On October 19, 1999, the Office of Air Quality issued a new permit to construct (141-10759-00172) which included CVD-21 and its associated flare. This permit limited the CO emissions from CVD-21 to 2.41 lb/hr. This limitation in addition to the 2.41 lb CO/hr limitations for each of CVD units 4, 5, 6, 10, and 12 through 20, limited the CO emissions of the 21 units to less than the significant level of 100 tons/yr, making PSD not applicable. Units 1, 2, 3, 7, 8, 9 and 11 were limited to random only processing.

On February 2, 2001, Honeywell, International, Inc. submitted an application to the Office of Air Quality to modify permits 141-11205-00172, issued on October 20, 1999 and 141-10759-00172, issued on October 19, 1999, to allow chemical vapor deposition (CVD) units 1, 2, 3, 7, 8, 9, and 11 to operate as non-woven carbon brake processes in addition to the currently permitted random fiber carbon brake processing.

To accomplish this, Honeywell will install and operate improved flares at each of the 21 CVD units, and revise the current limitations to maintain the CO emissions at a level that is less than the significant level of 100 tons/yr and maintain all other applicable limitations at levels that are as stringent or more stringent than the respective current requirements.

Honeywell will, for each of CVD units 1 - 21, install and operate improved flares to achieve an improved overall control efficiency of 98%.

A new short term hourly limit of 1.62 lb CO/hr (98.66 tons CO/yr) shall be established to provide a limit to all 21 units that provides a means of demonstrating compliance on a more continuous basis, and equates to an annual limit that is less than the applicable significant level of 100 tons CO/yr. The new short term limit is also less than the unit 4, 5, 6, 10, and 12 through 20 existing hourly limit of 2.41 lb CO/hr.

Finally, a new VOC limit of 0.23 lb/MMBtu for each flare shall be established that is less than the current limit of 0.26 lb/MMBtu.

The CO significant level of 100 tons/yr shall not be exceeded and all other applicable limitations and operating requirements are as stringent or more stringent than the respective current limitations and requirements. Thus, there is no relaxation of any conditions as a result of the proposed changes and limit revisions.

The two existing modifications, 141-11205-00172, issued on October 20, 1999 and 141-10759-00172, issued on October 19, 1999 shall all be combined into one significant source modification with this modification superseding the existing modifications.

CVD units 1 through 21 shall be allowed to utilize either the random or non-woven processes, the owner or operator shall install and operate new improved flares to each CVD unit, the overall control efficiency of each flare shall be 98%, a short term CO limit of 1.62 lb/hr (98.66 tons CO/yr) shall be established, and the VOC emissions from the flares of CVD units 1 - 21 shall be reduced to 0.23 lb/MMBtu.

Stack testing shall be required from representative CVD unit(s), as determined by the Office of Air Quality, to establish the flare temperature for the units that achieve the overall efficiency required to meet the hourly CO limits for the CVD units, the VOC emission limits, and the reduced CO, VOC, NOx, and HAP emissions. Existing stack test data may be used if deemed satisfactory.

Compliance shall be demonstrated by requiring continuous monitoring and recording of the flare temperatures for all 21 units, and that records of the data collected be kept and made available upon request of the Office of Air Quality.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)
S-FL-1	CVD-1 Internal Flare	40	3.2
S-FL-2	CVD-2 Internal Flare	40	3.2
S-FL-3	CVD-3 Internal Flare	40	3.2
S-FL-4	CVD-4 Internal Flare	40	3.2
S-FL-5	CVD-5 Internal Flare	40	3.2
S-FL-6	CVD-6 Internal Flare	40	3.2
S-FL-7	CVD-7 Internal Flare	40	3.2
S-FL-8	CVD-8 Internal Flare	40	3.2
S-FL-9	CVD-9 Internal Flare	40	3.2
S-FL-10	CVD-10 Internal Flare	40	3.2
S-FL-11	CVD-11 Internal Flare	40	3.2
S-FL-12	CVD-12 Internal Flare	40	3.2
S-FL-13	CVD-13 Internal Flare	40	3.2
S-FL-14	CVD-14 Internal Flare	40	3.2
S-FL-15	CVD-15 Internal Flare	40	3.2
S-FL-16	CVD-16 Internal Flare	40	3.2
S-FL-17	CVD-17 Internal Flare	40	3.2
S-FL-18	CVD-18 Internal Flare	40	3.2
S-FL-19	CVD-19 Internal Flare	40	3.2
S-FL-20	CVD-20 Internal Flare	40	3.2
S-FL-21	CVD-21 internal flare	40	3.2

Stack No. 471 will be removed from the permit due to the removal of the electric carbonization furnaces (ECF-4 and ECF-5).

### Recommendation

The staff recommends to the Commissioner that the Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

### Emission Calculations

#### UNRESTRICTED PTE AFTER THE MODIFICATION:

##### 1. VOC from CVD Units 1 - 21:

The following calculations determine the unrestricted VOC PTE from CVD units 1 - 21 based on worst case non-woven processing, 20.6 lb VOC/hr, emissions before controls, a maximum production time of 5800 hours, 21 units, and emissions before controls.

$$20.6 \text{ lb VOC/unit-hr} * 5800 \text{ hr/yr} * 1/2000 \text{ ton/lb} * 21 \text{ Units} = \mathbf{1254.54 \text{ ton VOC/yr}}$$

## 2. NOx from CVD Units 1 - 21:

The following calculations determine the unrestricted NOx PTE based on the maximum natural gas feed rates of 4950 scfh, 5800 hr/yr, 713 Btu/cf, 1.45 E-7 lb NOx/Btu, 21 units, and emissions before controls.

$$4950 \text{ scf/hr} * 5800 \text{ hr/yr} * 713 \text{ Btu/cf} * 1.45 \text{ E-7 lb NOx/Btu} * 1/2000 \text{ ton/lb} * 21 = \mathbf{31.17 \text{ tons NOx/yr}}$$

## 3. CO:

The following calculations determine the unrestricted CO PTE based 2.41lb CO/hr for the random process based on stack test data, 5800 hours of operation, 21 units, and emissions before controls.

$$2.41 \text{ lb CO/hr} * 5800 \text{ hr/yr} * 1/2000 \text{ ton/lb} * 21 = \mathbf{146.77 \text{ tons CO/yr}}$$

## 4. HAPs from CVD Units 1 - 21:

The following calculations determine the unrestricted HAP emissions based on the maximum lb/hr rates as obtain from stack test data, the maximum hours of operation, and emissions before controls:

a. Benzene:	2.11 lb/hr * 5800 hr/yr * 1/2000 ton/lb * 21	=	128.50 tons Benzene/yr
b. Toluene :	0.225 lb/hr * 5800 hr/yr * 1/2000 ton/lb * 21	=	13.70 tons Toluene/yr
c. Styrene:	0.209 lb/hr * 5800 hr/yr * 1/2000 ton/lb * 21	=	12.73 tons Styrene/yr

## UNRESTRICTED PTE DUE TO THE MODIFICATION:

The unrestricted potential to emit (PTE) due to the modification to a major PSD source is based on future potential versus past actual emissions.

The future unrestricted potential emissions from units 1 - 21, as estimated above, are listed in the following table.

PM tons/yr	PM10 tons/yr	SO2 tons/yr	VOC tons/yr	NOx tons/yr	CO tons/yr	HAPs tons/yr
-	-	-	1254.54	31.17	146.77	154.93

The actual emissions from units 1 - 21 for calendar years 1999 and 2000, as submitted by Honeywell on March 26, 2001 in a response to a notification of deficiency sent on March 9, 2001, are listed in the following table. The actual emissions are the average of the two most recent consecutive years.

$$\text{Actual Emissions tons/yr} = [ 1999 \text{ Actual Emissions tons/yr} + 2000 \text{ Actual Emissions} ] / 2$$

	PM tons/yr	PM10 tons/yr	SO2 tons/yr	VOC tons/yr	NOx tons/yr	CO tons/yr	HAPs tons/yr
1999	-	-	-	6.7	27.2	80.7	N/A*
2000	-	-	-	6.9	29.2	52.2	N/A*
<b>Avg.</b>	-	-	-	<b>6.8</b>	<b>28.2</b>	<b>66.45</b>	<b>N/A*</b>

The unrestricted potential to emit due to the modification based on future potential minus past actual is determined as follows:

Potential to Emit Due to Modification (PTE) = Future Potential (tons/yr) - Past Actual (tons/yr)

	PM tons/yr	PM10 tons/yr	SO2 tons/yr	VOC tons/yr	NOx tons/yr	CO tons/yr	HAPs tons/yr
FP	-	-	-	1254.54	31.17	146.77	N/A*
PA	-	-	-	6.8	28.20	66.45	N/A*
<b>PTE</b>	-	-	-	<b>1247.74</b>	<b>2.97</b>	<b>80.32</b>	<b>N/A*</b>

\* Hazardous air pollutant (HAP) emissions are not utilized in determining PSD status. Therefore, the HAP potential to emit due to the modification is determined based on future potential versus past potential. The future potential HAP emissions are determined above. The past potential HAP emissions are as follows.

Benzene (Random):	6.85E-3 lb/hr * 7200 hr/yr * 1/2000 ton/lb * 7	=	0.17 ton/yr
Toluene (Random):	8.64E-3 lb/hr * 7200 hr/yr * 1/2000 ton/lb * 7	=	0.22 ton/yr
Styrene (Random):	6.12E-3 lb/hr * 7200 hr/yr * 1/2000 ton/lb * 7	=	0.15 ton/yr
Benzene (Non-woven):	2.11 lb/hr * 5800 hr/yr * 1/2000 ton/lb * 14	=	85.67 tons/yr
Toluene (Non-woven):	0.225 lb/hr * 5800 hr/yr * 1/2000 ton/lb * 14	=	9.14 tons/yr
Styrene (Non-woven):	0.209 lb/hr * 5800 hr/yr * 1/2000 ton/lb * 14	=	<u>8.49 tons/yr</u>
			103.84 tons/yr

	Benzene tons/yr	Toluene tons/yr	Styrene tons/yr	Combined tons/yr
FP	128.50	13.70	12.73	154.93
PP	85.84	9.36	8.64	103.84
<b>PTE</b>	<b>42.66</b>	<b>4.34</b>	<b>4.09</b>	<b>51.09</b>

#### **POTENTIAL EMISSIONS AFTER CONTROLS:**

The following calculations determine the potential emission after controls based on VOC and HAP reduction, a flare efficiency of 98%, and the estimated unrestricted PTE from units 1 - 21 after the modification:

##### **1. VOC:**

$$1254.54 \text{ tons VOC/yr} * (1 - 0.98) = 25.09 \text{ tons/yr}$$

## 2. HAPs:

- a. Benzene: 128.50 tons/yr \* (1 - 0.98) = 2.57 tons/yr
- b. Toluene: 13.70 tons/yr \* (1 - 0.98) = 0.27 tons/yr
- c. Styrene: 12.73 tons/yr \* (1 - 0.98) = 0.25 tons/yr
- d. Total HAPs: 3.09 tons/yr

All other emissions are uncontrolled and are equal to the unrestricted PTE due to the modification.

### LIMITED EMISSIONS:

#### CO:

The CO emissions from units 1 - 21 each shall be limited to 1.62 lb CO/hr for a combined total CO of 98.66 tons/yr.

$$1.62 \text{ lb CO/hr} * 5800 \text{ hr/yr} * 1/2000 \text{ ton/lb} * 21 = 98.66 \text{ tons CO/yr}$$

### SUMMARY OF EMISSIONS:

The following is a summary of the emissions due to the proposed modification:

#### a. Criteria Pollutants:

	PM tons/yr	PM10 tons/yr	SO2 tons/yr	NOx tons/yr	VOC tons/yr	CO tons/yr
Unrestricted PTE After the Mod.	-	-	-	31.17	1254.54	146.77
Actual Emissions	-	-	-	28.20	6.80	66.45
Unrestricted PTE Due to the Mod.	-	-	-	2.97	1247.74	80.32
Emissions After Controls After the Mod.	-	-	-	31.17	25.09	146.77
Emissions After Limits, After Cont., After Mod.	-	-	-	31.17	25.09	98.66

#### b. Hazardous Air Pollutants:

	Benzene tons/yr	Toluene tons/yr	Styrene tons/yr	Combined HAPs tons/yr
Unrestricted PTE After the Mod.	128.50	13.70	12.73	154.93
Unrestricted PTE Before the Mod.	85.84	9.36	8.64	103.84
Unrestricted PTE Due to the Mod.	42.66	4.34	4.09	51.09
Emissions After Controls After the Mod.	1.29	0.14	0.13	3.09
Emissions After Limits, After Controls, After the Mod.	1.29	0.14	0.13	3.09

### Potential To Emit of Revision

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls for the CVD units due the proposed modification. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. The emissions in these tables are the net increase in the PTE before controls and limitations resulting from the proposed changes to the CVD units.

Pollutant	Potential To Emit (tons/year)
PM	-
PM <sub>10</sub>	-
SO <sub>2</sub>	-
VOC	1247.74
CO	80.32
NO <sub>x</sub>	2.97

HAP	Potential To Emit (tons/year)
Benzene	42.66
Toluene	4.34
Styrene	4.09
Combined	51.09

### Justification for Modification

The proposed changes are being modified through a Significant Source Modification pursuant to 326 IAC 2-7-12(d) which states “A significant source modification is a modification that is not a minor permit modification or an administrative amendment” and includes any modification with a potential to emit (PTE) greater than or equal to twenty-five (25) tons per year of PM, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC, H<sub>2</sub>S, TRS, reduced sulfur compounds, or fluorides, single HAP emissions that exceed 10 tons per year and combined HAP emissions greater than 25 tons per year.

The PTE of VOC and CO exceed 25 tons per year, the worst case single HAP and combined HAP emissions exceed 10 and 25 tons/yr, respectively, and the modification is not an administrative amendment or a minor source modification.

Thus, a significant source modification is required.

### County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as maintenance attainment for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) St. Joseph County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	0.80
PM <sub>10</sub>	-
SO <sub>2</sub>	-
VOC	678.00
CO	-
NO <sub>x</sub>	-

- (a) This existing source is a major PSD stationary source because the volatile organic compounds (VOC) are emitted at a rate of 250 tons per year or more. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do apply.
- (b) This existing source is a Title V major stationary source because the volatile organic compounds (VOC) are emitted at a rate of 100 tons/yr or more. These emissions are based upon the limited emissions table in the Technical Support Document (TSD) to CP 141-10759-00172, issued on October 19, 1999.\*

\* No existing source HAP data is available that can be used to determine the existing source operating permit status. However, this data is not necessary for the source operating permit definition because the source VOC emissions exceed the applicable level of 100 tons/yr and define the source at the highest level operating permit, a major Part 70 source.

### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit after the modification, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this significant source modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
CVD Units 1 - 21	-	-	-	25.09	98.66	31.17	3.09
PSD Significant Levels	25	15	40	40	100	40	-

- (a) The carbon monoxide emission rate from CVD units 1 - 21, each, are limited to 1.62 pounds per hour based on maximum soak phase operation of 5800 hours per year for the worst case non-woven process. This limit is equivalent to 98.66 tons of CO emissions per year.
- (b) The volatile organic compound emissions (VOC) from CVD units 1 - 21, each, are controlled by flares which reduce the emissions with an overall efficiency of 98 percent. The VOC emissions after controls from units 1 - 21 are estimated to be 25.09 tons per year.
- (c) The hazardous air pollutants emitted from CVD units 1 - 21 (benzene, toluene, and styrene), are controlled by flares which reduce the emissions with an overall efficiency of 98 percent. The combined HAP emissions after controls from units 1 - 21 are estimated to be 3.09 tons per year.
- (d) Since the potential to emit of volatile organic compounds (VOC), carbon monoxide (CO), and oxides of nitrogen (NO<sub>x</sub>) are less than their respective significant levels, the modification, for the purposes of new source review (NSR), is determined to be a minor modification to an existing major PSD source. Therefore, the proposed modification is not subject to PSD review, 40 CFR 52.21 and 326 IAC 2-2.



## **Federal Rule Applicability**

### **New Source Performance Standards (NSPS)**

There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable due to the proposed combined modification.

### **National Emissions Standards for Hazardous Air Pollutants (NESHAP):**

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable due to the proposed combined modification.

## **State Rule Applicability - Entire Source**

### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC and it is located in St. Joseph County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source.

This annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4.

### **326 IAC 5-1-2 (Visible Emissions Limitations)**

This source, which is located in St. Joseph County north of Kern Road and east of Pine Road, is subject to 326 IAC 5-1-2 (Visible Emission Limitations) which limits visible emissions from a source or facility. Pursuant to 326 IAC 5-1-2, except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

## **State Rule Applicability - Individual Facilities**

### **326 IAC 2-4.1-1 (New Source Toxics Control)**

Each CVD unit is independently distinguishable from the other units as a "process or production unit" as defined in 40 CFR 63.41 (incorporated by reference in 326 IAC 2-4.1). The potential to emit (PTE) of combined hazardous air pollutants (HAPs) for CVD units 1-21 are less than 25 tons per year and the potential to emit (PTE) of all single HAP for CVD units 1-21 are less than 10 tons per year. Therefore, the requirements of this rule do not apply.

### **326 IAC 8-1-6 (New Facilities, General Reduction Requirements)**

This rule is applicable to CVD units 1-21 because the units were constructed after January 1, 1980, with the potential uncontrolled VOC emissions from each unit being greater than 25 tons per year.

Internal flaring has been accepted as BACT for control of the VOC emissions from the CVD units 1 - 21. All exhaust process gas from the CVD units shall be directed to and combusted by the unit's internal flare and the flare shall achieve an overall control efficiency of at least 99% volatile organic compounds.

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Initial compliance shall be demonstrated by requiring stack testing. Said stack testing establishes the minimum flare temperature required to achieve the overall control efficiency that meets the short term hourly and annual CO limits for the CVD units, the VOC emission limits, and the reduced CO, VOC, NOx, and HAP emissions.

Compliance on a continuous basis shall be demonstrated by requiring continuous monitoring and recording of the temperature of all 21 flares. Said records shall be kept for a minimum period of five years made available upon request of the Office of Air Quality. Monitoring and recording the temperature provides the means by which compliance is demonstrated on a continuous basis.

## Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

### Condition A.2:

Condition A.2 shall be amended to include the most up to date descriptions of the CVD units, reflect random and non-woven processing for all 21 units, and identify and describe the new improved flares.

### A.2 Emission Units and Pollution Control Equipment Summary

The source is hereby authorized to construct the following emission units and pollution control devices:

- (a) Two (2) previously permitted electric carbonization furnaces (ID Nos. ECF-2 and ECF-3), both controlled by one (1) natural gas fired thermal oxidizer (ID No. TO-1) rated at 1.5 million (MM) Btu per hour, exhausting through one (1) stack (ID No. 470). (Previously permitted in CP-141-8117-00005, issued May 20, 1997, as two electric carbonization furnaces with a 1.0 MMBtu per hour natural gas fired thermal afterburner for VOC control.)

- (b) **Twenty-one (21)** chemical vapor deposition (CVD) units, also known as carbon vapor deposition units, ~~including:~~
- (1) ~~One (1) existing CVD unit (ID No. CVD-1), with an estimated batch capacity of 2400 pounds (initial weight) of brakes and a nominal total reactant gas flow of 360 scf per soak hour.~~
  - (2) ~~One (1) existing CVD unit (ID No. CVD-2), newly modified to have an estimated batch capacity of 5650 pounds (initial weight) of brakes for random fiber process and a nominal total reactant gas flow of 2000 standard cubic feet per soak hour.~~
  - (3) **identified as Six (6) existing CVD units (ID Nos. CVD-1 through CVD-21 CVD-4, CVD-5, CVD-6, CVD-10, CVD-12, and CVD-13), each with each unit having** an estimated batch capacity of 8800 pounds (initial weight) of brakes for random fiber process or 5300 pounds (initial weight) of brakes for non-woven process and **with** a nominal total reactant gas flow of 2000 scf per soak hour for random fiber process or a nominal total reactant gas flow of 4200 scf per soak hour for non-woven fiber process.
  - (4) ~~Five (5) existing CVD units (ID Nos. CVD-3, CVD-7, CVD-8, CVD-9, and CVD-11), each with an estimated batch capacity of 8800 pounds (initial weight) of brakes for random fiber process and with a nominal total reactant gas flow of 2000 scf per soak hour.~~
  - (5) ~~One (1) CVD unit (ID No. CVD-14), with an estimated batch capacity of 8800 pounds (initial weight) of brakes for random fiber process or 5300 (initial weight) of brakes for non-woven process and with a nominal total reactant gas flow of 2000 scf per soak hour for random fiber process or a nominal total reactant gas flow of 4200 scf per soak hour for non-woven fiber process.~~
  - (6) ~~Six (6) new CVD units (ID Nos. CVD-15 through CVD-20), each with an estimated batch capacity of 8800 pounds (initial weight) of brakes for random fiber process or 5300 (initial weight) of brakes for non-woven process and with a nominal total reactant gas flow of 2000 scf per soak hour for random fiber process or a nominal total reactant gas flow of 4200 scf per soak hour for non-woven fiber process.~~

~~The exhaust gas from the soak phase of each CVD unit's cycle shall be directed through the following flares for VOC control:~~

- (c) **Twenty-One (21) new enclosed flares, to controlling the soak phase VOC emissions from CVD units 1 - 21, with each unit having** a rated capacity of ~~0-9~~ **5.5** million British thermal units per hour, ~~piloted by natural gas combustion, and emissions exhausted through stacks S-FL-1 through S-FL-21.~~
- (d) ~~Nineteen (19) new enclosed flares to control VOC emissions from CVD-2 through CVD-20, each having a rated capacity of 5.5 million British thermal units per hour, piloted by natural gas, and exhausting through stacks S-FL-2 through S-FL-20, respectively.~~

#### Section D.2 Facility Description:

The facility description of Section D.2 shall be amended to include the most up to date descriptions of the CVD units, reflect random and non-woven processing for all 21 units, and identify and describe the new improved flares.

## SECTION D.2 FACILITY OPERATION CONDITIONS - CVD Units

- (a) **Twenty-one (201)** chemical vapor deposition (CVD) units, also known as carbon vapor deposition units (ID Nos. CVD-1 through CVD-201).
- (b) ~~The exhaust gas from the soak phase of each CVD will be directed through the following enclosed flares for VOC control:~~
- (b) ~~One (1) new enclosed flare to control VOC emissions from CVD-1, having a rated capacity of 0.9 million British thermal units per hour, piloted by natural gas, and exhausting through stack S-FL-1.~~
- (c) **Twenty-one (21) Nineteen (19)** new enclosed flares, ~~to controlling~~ VOC emissions from CVD-12 through **CVD-210**, **with each unit** having a rated capacity of 5.5 million British thermal units per hour, ~~piloted by natural gas combustion, and emissions exhausting through stacks S-FL-12 through S-FL-210, respectively.~~

The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

### Condition D.2.1:

Condition D.2.1 shall be amended to reflect the new lower overall control efficiency of 99%, and reflect and clarify the new lower VOC limit of 0.23 lb VOC/MMBtu.

#### D.2.1 BACT Condition [326 IAC 8-1-6]

Enclosed flares have been accepted as BACT for control of the VOC emissions from the CVD units. All exhaust process gas from the soak phase of each CVD unit's cycle shall be directed through the enclosed flares for VOC control. Each enclosed flare shall operate at all times that the corresponding CVD unit is operating in the soak phase and shall achieve an overall ~~destruction~~ **control** efficiency of ~~989%~~ with a maximum VOC emission rate of 0.263 pounds of VOC per million British thermal units (MMBtu) of process gas combusted by the flares. ~~This limitation is equivalent to 37.7 tons of VOC emitted per year from CVD unit Nos. 1 through 20 combined based on the average heat content of the process gas being 762 Btu per cubic foot and the maximum reactant gas inputs for each unit.~~

### Condition D.2.2:

Condition D.2.2 shall be amended to reflect the new hourly CO limit for units 1 - 21 and to remove the random only processing requirement.

#### D.2.2 Prevention of Significant Deterioration (PSD) Minor Source Limit [326 IAC 2-2]

- (a) The carbon monoxide emissions from the enclosed flares for CVD units ~~4, 5, 6, 10, 12, 13, 14, 15, 16, 17, 18, 19, and 20~~ **1 through 21**, shall be limited to ~~2.44~~ **1.62** pounds per hour, each, based on maximum soak phase operation of 5800 hours per year for the non-woven process. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.
- (b) ~~The chemical vapor deposition units 1, 2, 3, 7, 8, 9, and 11, shall operate only the random fiber process. Therefore, the prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.~~

#### Condition D.2.4:

Condition D.2.4 shall be amended to require testing as deemed acceptable to the Office of Air Quality. Honeywell has already conducted initial stack testing for the CVD units that may already satisfy the testing requirements for this proposed modification. The revised condition provides the means by which the Compliance Section can determine the stack testing from the existing modifications that still needs to be performed, the stack testing that needs to be performed to satisfy the stack testing requirements of the new proposed changes, the pollutants to be tested, the methods to be used, and the number of units to be tested.

##### D.2.4 Testing Requirements [326 IAC 2-1-3]

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- (a) Compliance stack tests shall be performed **utilizing methods deemed acceptable by the Office of Air Quality** ~~from a representative selection of two (2) of the eighteen (18) large CVD units (ID Nos. CVD-3 through CVD-20) within 45 days after execution of the Stay Agreement, using a test protocol (submitted to IDEM on February 22, 1999) determined in conjunction with the IDEM OAM Compliance Data Section. One set of these tests shall be performed on a unit during a non-woven batch cycle, and the other set of these tests shall be performed on a unit during a random fiber batch cycle.~~
- (b) ~~The compliance tests shall be performed for the following pollutants to demonstrate the control efficiency of the flares, determine compliance for carbon monoxide and volatile organic compounds (VOC) with Prevention of Significant Deterioration (PSD) rules, and verify emission factors:.....~~

#### Condition D.2.5:

Condition D.2.5 currently requires the source to meet a minimum temperature of 1000 degrees Celcius. This requirement is too restrictive and does not allow for control equipment operational changes (higher or lower) should stack testing demonstrate that compliance with the limits is achieved at a different minimum temperature.

Thus, Condition D.2.5 shall be amended to require the source to achieve and maintain at a minimum, the temperature, as determined in the most recent approved stack test, that achieves the limitations and emission reductions required in Condition D.2.1 and D.2.1.

##### D.2.5 Monitoring

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To assure compliance with Conditions D.2.1 and D.2.2:

- (a) The input rate of total reactant gas to each CVD unit shall be measured once per day over the entire batch cycle. To monitor the volatile organic compound (VOC) load to the control flare, the Permittee shall record the number and type of brake discs per batch.
- (b) Each enclosed flare shall have a flame present at all times that its respective CVD unit is operating in the soak phase. A thermocouple or equivalent device shall be installed and operated to monitor the presence of a pilot flame for each flare and to sound an alarm when the flame is not detected. For each CVD unit operating the non-woven process, the flare shall maintain, at a minimum, **the operating temperature of 1000 degrees Celcius (°C) determined in the most recent approved stack test(s) to achieve compliance with the limits established in Conditions D.2.1 and D.2.2. In addition,** ~~and~~ a continuous monitoring system shall be installed and operated to monitor and record the operating temperature of the flare.

This system shall be accurate to  $\pm 5.0$  percent and capture temperature data at least once every fifteen (15) minutes. If the operating temperature of the flare for a CVD unit operating the non-woven process drops below the minimum operating temperature, the Permittee shall take and document response steps to return the operating temperature to the required minimum level. In the event that a breakdown of the monitoring equipment occurs, the Permittee shall supplement monitoring with visual checks once per hour to ensure that a flame is present.

- (c) The Permittee shall include in its PMP a maintenance program to inspect regularly the thermocouples or equivalent devices for monitoring and recording the presence of a pilot flame, to conduct routine maintenance and calibration on such monitors, and to initiate and record appropriate response steps in the event that the monitor fails.

## **Conclusion**

This source shall be subject to the conditions of the attached Significant Source Modification number 141-13853-00172.

**Indiana Department of Environmental Management**  
**Office of Air Quality**  
and  
**St. Joseph County Local Agency**

Addendum to the  
Technical Support Document for New Construction and Operation

Source Name:	Honeywell International, Inc.
Source Location:	3520 Westmoor Street, South Bend, Indiana 46628-1373
County:	St. Joseph
SIC Code:	3728
Operation Permit No.:	141-7442-00172
Issuance Date:	Pending
Source Modification No.:	141-13853-00172
Permit Reviewer:	SDF

On June 8, 2001, the Office of Air Quality (OAQ) had a notice published in the South Bend Tribune, in South Bend, Indiana, stating that Honeywell International, Inc. had applied for a modification to their existing aircraft wheel and brake manufacturing operation to allow chemical vapor deposition (CVD) units 1, 2, 3, 7, 8, 9, and 11 to operate as non-woven carbon brake processes in addition to the currently permitted random fiber carbon brake processing. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 5, 2001, Honeywell International, Inc. submitted comments on the proposed permit. The summary of the comments and corresponding responses is as follows:

**Comment 1:**

**Section A. Source Summary.** The permit incompletely and/or inaccurately describes the regulatory trigger for permitting or a permit modification by describing such trigger for changes "that may render this descriptive information obsolete or inaccurate". Thus, this language should be deleted.

**Response 1:**

The source summary shall be amended as requested.

**SECTION A SOURCE SUMMARY**

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and St. Joseph County Local Agency. The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation ~~that may render this descriptive information obsolete or inaccurate~~ may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

**Comment 2:**

**Section A.1. General Information.** The permit inaccurately describes St. Joseph County as non-attainment for particulate matter. The county status should state "Attainment for all criteria pollutants".

**Response 2:**

St. Joseph County is maintenance attainment for ozone and attainment or unclassifiable for all other criteria pollutants. Therefore, General Information Section A.1 shall be amended as follows to reflect the correct county status.

**A.1 General Information**

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The Permittee owns and operates an aircraft landing system manufacturing operation.

Responsible Official:	Adriane Brown
Source Address:	3520 Westmoor Street, South Bend, Indiana 46628-1373
Mailing Address:	3520 Westmoor Street, South Bend, Indiana 46628-1373
SIC Code:	3728
County Location:	St. Joseph
County Status:	<del>Non-</del> <b>Maintenance</b> attainment for <del>particulate matter (PM)</del> <b>ozone</b> , attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program

**Comment 3:**

**Section A.2(a) and D.1.** The Electric Carbonization Furnaces ECF-2 and ECF-3 were never installed and will not be installed at this facility, and therefore Conditions A.2(a) and D.1 should be removed from the permit.

**Condition A.2(b) and (c).** All 21 units are described as having the same capacities. CVD-1 (and its associated flare) is a smaller unit which should be described separately as follows:

One (1) chemical vapor deposition (CVD) unit, also known as carbon vapor deposition unit, identified as CVD-1, having an estimated batch capacity of 2400 pounds (initial weight) of brakes and a total reactant gas flow rate of 360 scf per soak hour. One (1) enclosed flare, controlling the soak phase VOC emissions from CVD-1, with a rated capacity of 0.9 million British units per hour, natural gas combustion, and emissions exhausted through stack S-FL-1.

In addition, the descriptions for the other 20 CVD units should be amended to units 2 through 21 and the description of the flares should be amended to reflect that the burners of the flares are being changed, not "new" flares. This change also recognizes that new burners are not necessary to demonstrate compliance with the new limits. The last source test showed CO at 1.55 lbs/hr with the existing flares and 0.203 lbs/hr for VOCs, which is below the permit limits.

**Response 3:**

The Table of Contents and Condition A.2(a) shall be amended, and Section D.1 removed as follows, to eliminate all references to Electric Carbonization Furnaces ECF-2 and ECF-3. Condition A.2(b) and (c) shall be amended as follows to correctly identify the CVD units and amending the flare description by removing the reference of the flares as being new. Section D.2 shall also be renumbered as Section D.1 and Section D.1 shall be removed from the Table of Contents.



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## **Modification Certification Report**

### **A.2 Emission Units and Pollution Control Equipment Summary**

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The source is hereby authorized to construct the following emission units and pollution control devices:

- (a) ~~Two (2) previously permitted electric carbonization furnaces (ID Nos. ECF-2 and ECF-3), both controlled by one (1) natural gas fired thermal oxidizer (ID No. TO-1) rated at 1.5 million (MM) Btu per hour, exhausting through one (1) stack (ID No. 470). (Previously permitted in CP-141-8117-00005, issued May 20, 1997, as two electric carbonization furnaces with a 1.0 MMBtu per hour natural gas fired thermal afterburner for VOC control.)~~
- (a) **One (1) chemical vapor deposition (CVD) unit, also known as carbon vapor deposition unit, identified as CVD-1, having an estimated batch capacity of 2400 pounds (initial weight) of brakes and a total reactant gas flow rate of 360 scf per soak hour. One (1) enclosed flare, controlling the soak phase VOC emissions from CVD-1, with a rated capacity of 0.9 million British units per hour, natural gas combustion, and emissions exhausted through stack S-FL-1.**

- (b) ~~Twenty-one (210)~~ chemical vapor deposition (CVD) units, also known as carbon vapor deposition units, identified as CVD-~~42~~ through CVD-21, with each unit having an estimated batch capacity of 8800 pounds (initial weight) of brakes for random fiber process or 5300 pounds (initial weight) of brakes for non-woven process, and a nominal total reactant gas flow of 2000 scf per soak hour for random fiber process or a nominal total reactant gas flow of 4200 scf per soak hour for non-woven fiber process.
- (c) ~~Twenty-one (210)~~ new enclosed flares, controlling the soak phase VOC emissions from CVD units ~~42~~ - 21, with each unit having a rated capacity of 5.5 million British thermal units per hour, natural gas combustion, and emissions exhausted through stacks S-FL-~~42~~ through S-FL-21.

#### **SECTION D.1 – FACILITY OPERATION CONDITIONS – Electric Carbonization Furnaces**

Two (2) electric carbonization furnaces (ID Nos. ECF-2 and ECF-3), each with a maximum capacity of 2,900 pounds of preforms of brake discs per batch at a maximum rate of 91 batches per year. ECF-2 and ECF-3 are both controlled by one (1) natural gas fired thermal oxidizer (ID No. TO-1), rated at 1.5 million (MM) Btu per hr, exhausting through one (1) stack (ID No. 470).

The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

#### **Emission Limitations and Standards**

##### **~~D.1.1 – BACT Condition [326 IAC 8-1-6]~~**

The thermal oxidizer shall operate at all times that the corresponding electric carbonization furnaces are operated. When operating, the thermal incinerators shall maintain a minimum 90% overall destruction of the volatile organic compound (VOC).

##### **~~D.1.2 – Preventive Maintenance Plan [326 IAC 1-6-3]~~**

A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for the control device for this facility.

#### **Compliance Determination Requirements**

##### **~~D.1.3 – Testing Requirements [326 IAC 2-1-3]~~**

Compliance stack tests shall be performed for VOC emissions from one set of electric carbonization furnaces (ID Nos. ECF-2 and ECF-3) within 60 days after the first set achieves maximum production rate, but no later than 180 days after initial start-up.

The electric carbonization furnaces commenced operation but have suspended operation as of April 19, 1999, before the compliance stack testing deadline (June 14, 1999). If these furnaces start-up production after April 19, 1999, the Permittee agrees to submit, prior to the start-up, written notice to IDEM of the start-up date, and to conduct compliance stack tests as described herein within 60 days after achieving maximum production rate, but no later than 90 days after recommencing start-up.

The tests on the electric carbonization furnaces shall be performed before and after control to confirm the control efficiency of the thermal oxidizer. These tests shall be performed according to 326 IAC 3-6 (Source Sampling Procedures) using the methods specified in the rule or as approved by the Commissioner.

## **Compliance Monitoring Requirements**

### **D.1.4 Monitoring**

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- (a) ~~The thermal incinerator shall operate within a minimum temperature range necessary to maintain a minimum 90% overall destruction of the volatile organic compounds (VOC). Initially, that minimum operating temperature range shall be set at 1500 to 1600 degrees Fahrenheit (°F). If compliance testing determines a different range, the range shall be adjusted accordingly.~~
- (b) ~~A continuous monitoring system shall be installed and operated to monitor and record the operating temperature. This system shall be accurate to ±5.0 percent.~~
- (c) ~~The Permittee shall include in its PMP a maintenance program to inspect regularly the continuous monitor for operating temperature, to conduct routine maintenance and calibration on such monitor, and to initiate and record appropriate response steps in the event that the monitor fails or indicates that the thermal oxidizer is operating outside the minimum temperature range.~~

## **Record Keeping and Reporting Requirements**

### **D.1.5 Record Keeping Requirements**

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- (a) ~~To document compliance with Condition D.1.4 the Permittee shall maintain a log of daily thermal incinerator temperatures.~~
- (b) ~~All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.~~

### **Comment 4:**

**Condition A.4.** The reference to the permit that is being replaced is inaccurate. The correct reference should be to permits 141-11205 and 141-10759-00172, not 141-8761-00005.

### **Response 4:**

Condition A.4 shall be amended as follows to reflect the correct permits.

### **A.4 Prior Permit Conditions Superseded [326 IAC 2]**

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The terms and conditions of this permit supersede all terms and conditions in ~~GP-141-8761-00005~~ **permits 141-11205-00172 and 141-10759-00172.**

### **Comment 5:**

**Conditions B.1 General Construction Conditions.** The terms in this condition which have been stricken in other permits, are not in step with current interpretations of law or model permit language. The provisions of this Condition should be deleted.

**Condition B.5, First Time Operating Permit.** We should note that this is not a first time operating permit for CVD units, but rather is an amended operating permit allowing for the modification of the CVDs to process brakes using the Non-Woven process. As such we would anticipate that the affidavit of construction would be submitted for the individual CVDs as they are modified. We would not anticipate the need to submit similar affidavits for the modified flares since the modifications are not necessary to comply with the permit limits as noted above, and since the modifications themselves would lower emissions.

**Condition B.6, General Operating Conditions.** These terms should be deleted for the reasons set forth above with regard to Condition B.1.

#### Response 5:

The proposed Section B reflects the Section B of the original permits. All of these conditions shall be removed and replaced with the most current Section B language for significant source modifications.

### **SECTION B — GENERAL CONSTRUCTION AND OPERATION CONDITIONS**

~~THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW:~~

#### **Construction Conditions ~~[326 IAC 2-1-3.4]~~**

##### ~~B.1 — General Construction Conditions~~

- ~~(a) The data and information supplied with the application shall be the basis for this permit. Prior to any proposed change in construction which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1, the change must be approved by the Office of Air Quality (OAQ).~~
- ~~(b) This permit to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.~~

##### ~~B.2 — Effective Date of Permit~~

~~Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.~~

##### ~~B.3 — Revocation of Permits ~~[326 IAC 2-1-9(b)]~~~~

~~Pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.~~

##### ~~B.4 — Permit Review Rules ~~[326 IAC 2]~~~~

~~Notwithstanding Construction Condition B.5, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules):~~

##### ~~B.5 — First Time Operation Permit~~

~~This document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:~~

- (a) ~~The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.~~
- (1) ~~If the affidavit of construction verifies that the facilities covered in the Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the affidavit of Construction is postmarked or hand-delivered to IDEM.~~
- (2) ~~If the affidavit of construction does not verify that the facilities covered in the Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.~~
- (b) ~~If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.~~
- (c) ~~Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.~~

~~The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).~~

~~The Permittee has submitted their Part 70 permit application (T141-7442-00005) on December 10, 1996, for the existing source. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.~~

## Operation Conditions

### ~~B.6 General Operation Conditions~~

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- (a) ~~The data and information supplied in the application shall be the basis for this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Quality (OAQ).~~
- (b) ~~The permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder.~~

### ~~B.7 Preventive Maintenance Plan [326 IAC 1-6-3]~~

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- (a) ~~If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:~~
- (1) ~~Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;~~
- (2) ~~A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;~~

- (3) ~~Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.~~

~~If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:~~

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) ~~The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.~~
- (c) ~~PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.~~

~~B.8 Transfer of Permit [326 IAC 2-1-6]~~

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- (a) ~~In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permit Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.~~
- (b) ~~The written notification shall be sufficient to transfer the permit from the current owner to the new owner.~~
- (c) ~~The OAQ shall reserve the right to issue a new permit.~~

~~B.9 Permit Revocation [326 IAC 2-1-9(a)]~~

---

~~This permit to construct and operate may be revoked for any of the following causes:~~

- (a) ~~Violation of any conditions of this permit.~~
- (b) ~~Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.~~
- (c) ~~Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.~~
- (d) ~~Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.~~
- (e) ~~For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).~~

~~B.10 Availability of Permit [326 IAC 2-1-3(l)]~~

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~~The Permittee shall maintain the applicable permit on the premises of this source and shall make this permit available for inspection by the IDEM, or other public official having jurisdiction.~~

~~B.11 Malfunction Condition [326 IAC 1-6-2]~~

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- ~~(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.~~
- ~~(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ. Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.~~
- ~~(c) Failure to report a malfunction of any emission control equipment subject to the requirements of this rule (326 IAC 1-6) shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).~~
- ~~(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]~~

~~B.12 Permit No Defense [326 IAC 2-1-10] [IC 13]~~

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~~Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard.~~

**SECTION B GENERAL CONSTRUCTION CONDITIONS**

~~B.1 Definitions [326 IAC 2-7-1]~~

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~~Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.~~

~~B.2 Effective Date of the Permit [IC13-15-5-3]~~

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~~Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.~~

~~B.3 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]~~

---

~~Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.~~

~~B.4 Significant Source Modification [326 IAC 2-7-10.5(h)]~~

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~~This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:~~

- ~~(a) The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.~~



- (b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (e) In the event that the Part 70 application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:
  - (1) If the Part 70 draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Part 70 draft.
  - (2) If the Part 70 permit has gone through final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go through a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Part 70 permit at the time of issuance.
  - (3) If the Part 70 permit has gone through public notice, but has not gone through final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Part 70 permit, and the Title V permit will issued after EPA review.

#### B.5 Local Agency Requirement

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An application for an operation permit must be made ninety (90) days before start up to:

St. Joseph County Local Agency  
City County Building, Room 914  
South Bend, IN 46601-1870

The operation permit issued by St. Joseph County Local Agency shall contain as a minimum the conditions in the Operation Conditions section of this permit.

#### Comment 6:

**Condition C.3, Asbestos Abatement Accreditation.** This condition has no relationship to the emission units covered by this permit. It is a facility wide requirement and therefore would be appropriate for inclusion in the Title V permit when issued. We request that this condition be eliminated from this permit.

**Condition C.6, Annual Emission Statement.** This condition has no relationship to the emission units covered by this permit. It is a facility wide requirement and therefore would be appropriate for inclusion in the Title V permit when issued. We request that this condition be eliminated from this permit.

**Condition C.7, Monitoring Data Availability.** Honeywell requests that its permits reflect the changes regarding monitoring that are ultimately made in response to the discussions between the State and the CASE Coalition.

**Condition C.8, General Recordkeeping Requirements.** Consistent with the Model Permit, subsections (b) and (c) should be deleted.

**Response 6:**

The permits being superseded are Construction Permit 141-11205-00172, issued on October 20, 1999 and Significant Source Modification 141-10759-00172, issued on October 19, 1999.

The asbestos abatement accreditation requirements of proposed Condition C.3 were required in applicable construction permit 141-11205-00172, issued on October 20, 1999. The annual emission statement requirements of proposed Condition C.6 were required in Construction Permit 141-11205-00172, issued on October 20, 1999 and Significant Source Modification 141-10759-00172, issued on October 19, 1999. Thus, these conditions shall be included in the proposed modification.

Regarding the Monitoring Data Availability and General Recordkeeping Requirements of Conditions C.7 and C.8, Honeywell has requested that these conditions be amended to reflect the most recent language agreed to by CASE and OAQ, and the most recent model language.

While the language currently utilized in the permit has been established, IDEM continues to work with its partners in permitting to update and improve the format and language of its permits, including the CASE language referenced by Honeywell International. However, the issues regarding the CASE language have not been finally decided upon. IDEM recognizes this comment by the company, but cannot amend the language as requested until resolution to these concerns is determined. Thus, the requested language will not be incorporated into the permit at this time. However, to satisfy the request to use the most current model language for Condition C.8, a new Section C shall be drafted as follows, utilizing the most current model language, with any more stringent requirements of the Section Cs of the existing permits and any applicable changes resulting from previous comments being retained.

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**~~G.1 — Opacity [326 IAC 5-1-2]~~**

~~Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:~~

- ~~(a) — Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.~~
- ~~(b) — Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.~~

**~~G.2 — Operation of Equipment~~**

~~Except as provided otherwise, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.~~

~~C.3 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]~~

- ~~(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.~~
- ~~(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:~~
- ~~(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or~~
- ~~(2) If there is a change in the following:~~
- ~~(A) Asbestos removal or demolition start date;~~
- ~~(B) Removal or demolition contractor; or~~
- ~~(C) Waste disposal site.~~
- ~~(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~
- ~~(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).~~

~~All required notifications shall be submitted to:~~

~~Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015~~

- ~~(e) Procedures for Asbestos Emission Control~~  
~~The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~
- ~~(f) Indiana Accredited Asbestos Inspector~~  
~~The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.~~

## Testing Requirements

### ~~G.4 Performance Testing [326 IAC 3-6] [326 IAC 2-1-4]~~

- ~~(a) All testing shall be performed according to the provisions of 326 IAC 2-1-4 and 326 IAC 3-6 (Source Sampling Procedures) utilizing applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75 or other procedures and methods approved by IDEM, OAQ.~~

~~A test protocol, except as provided elsewhere in this permit, shall be submitted to:~~

~~Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015~~

~~no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.~~

- ~~(b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.~~

## Corrective Actions and Response Steps

### ~~G.5 Actions Related to Noncompliance Demonstrated by a Stack Test~~

- ~~(a) When the results of a stack test performed in conformance with Section G- Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee also shall take appropriate action to minimize emissions from the affected facility while the response actions are being implemented.~~
- ~~(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.~~
- ~~(c) IDEM, OAQ reserves the authority to take any actions allowed under law to resolve noncompliant stack tests.~~

## Record Keeping and Reporting Requirements

### ~~G.6 Emission Statement [326 IAC 2-6]~~

- ~~(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~
- ~~(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~

- (2) ~~Indicate actual emissions of other regulated pollutants (as that term is defined at 326 IAC 2-7-1(32)) from the source, for purposes of Part 70 fee assessment.~~
- (b) ~~The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:~~
- ~~Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015~~
- (c) ~~The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.~~

~~C.7 Monitoring Data Availability~~

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- (a) ~~If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, as required by Section D Compliance Monitoring and Record Keeping Requirements, reasons for this must be recorded.~~
- (b) ~~At its discretion, IDEM may excuse such failures providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.~~
- (c) ~~Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.~~

~~C.8 General Record Keeping Requirements~~

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- (a) ~~Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of two (2) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining three (3) years as long as they are available upon request. Upon request from an IDEM, OAQ representative, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.~~
- (b) ~~Records of required monitoring information shall include, where specified in Section D of the permit:~~
- ~~(1) The date, place, and time of sampling or measurements;~~
- ~~(2) The dates analyses were performed;~~
- ~~(3) The company or entity performing the analyses;~~
- ~~(4) The analytic techniques or methods used;~~

- ~~(5) The results of such analyses; and~~
- ~~(6) The operating conditions existing at the time of sampling or measurement.~~
- ~~(e) Support information shall include, where specified in Section D of the permit:~~
  - ~~(1) Copies of all reports required by this permit;~~
  - ~~(2) All original strip chart recordings for continuous monitoring instrumentation;~~
  - ~~(3) All calibration and maintenance records;~~
- ~~(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.~~

## **SECTION C GENERAL OPERATION CONDITIONS**

### **C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]**

---

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.**
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.**
- (c) A responsible official is defined at 326 IAC 2-7-1(34).**

### **C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, including the following information on each facility:**
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;**
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and**
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.**

**If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:**

**Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015, and**

**St. Joseph County Local Agency  
City County Building, Room 914  
South Bend, IN 46601-1870**

**The PMP and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.**
- (c) A copy of the PMPs, as required by 326 IAC 1-6-3, shall be submitted to IDEM, OAQ, and St. Joseph County Local Agency upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and St. Joseph County Local Agency. IDEM, OAQ, and St. Joseph County Local Agency may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or St. Joseph County Local Agency makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or St. Joseph County Local Agency within a reasonable time.**

**C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:**

**Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015, and**

**St. Joseph County Local Agency  
City County Building, Room 914  
South Bend, IN 46601-1870**

Any such application shall be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

#### **C.4 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### **C.5 Fugitive Dust Emissions [326 IAC 6-4]**

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### **C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

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Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

#### **C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:



- (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015, and

St. Joseph County Local Agency  
City County Building, Room 914  
South Bend, IN 46601-1870

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

#### Testing Requirements [326 IAC 2-7-6(1)]

#### C.8 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

- (a) All required compliance testing shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

**Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015, and**

**St. Joseph County Local Agency  
City County Building, Room 914  
South Bend, IN 46601-1870**

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and St. Joseph County Local Agency within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and St. Joseph County Local Agency, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

##### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

##### **C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

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- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (a) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ, and St. Joseph County Local Agency upon request and shall be subject to review and approval by IDEM, OAQ, and ST. Joseph County Local Agency. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

- (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and**
  - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.**
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.**
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:**
  - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.**
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.**
  - (3) An automatic measurement was taken when the process was not operating.**
  - (4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.**
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.**
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.**
- (f) At its discretion, IDEM may excuse the Permittee’s failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.**

**C.14 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and St. Joseph County Local Agency within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

**Office of Air Quality:**

**(A) Telephone Numbers:**

1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or  
317-233-5674 (ask for Compliance Section)

**(B) Facsimile Number:** 317-233-5967

**Local Agency:**

**(A) Telephone Number:** 219-235-9775

**(B) Facsimile Number:** 219-235-9497

**Northern Regional Office:**

**(A) Telephone Numbers:** 1-800-753-5519

219-245-4870

**(B) Facsimile Number:** 219-245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

**Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015, and**

**St. Joseph County Local Agency  
City County Building, Room 914  
South Bend, IN 46601-1870**

**within two (2) working days of the time when emission limitations were exceeded due to the emergency.**

**The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:**

- (A) A description of the emergency;**
- (B) Any steps taken to mitigate the emissions; and**
- (C) Corrective actions taken.**

**The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

- (6) The Permittee immediately took all reasonable steps to correct the emergency.**
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.**
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.**
- (e) IDEM, OAQ, and St. Joseph County Local Agency may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.**
- (f) Failure to notify IDEM, OAQ, and St. Joseph County Local Agency by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.**
- (g) Operations may continue during an emergency only if the following conditions are met:**

- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
  - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
  - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.16 Monitoring Data Availability**

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- (a) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, as required by Section D Compliance Monitoring and Record Keeping Requirements, reasons for this must be recorded.

- (b) At its discretion, IDEM may excuse such failures providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (c) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

**C.17 Emission Statement [326 IAC 2-6]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants (as that term is defined at 326 IAC 2-7-1(32)) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015, and

St. Joseph County Local Agency  
City County Building, Room 914  
South Bend, IN 46601-1870
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or St. Joseph County Local Agency makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or St. Joseph County Local Agency within a reasonable time.



- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015, and

St. Joseph County Local Agency  
City County Building, Room 914  
South Bend, IN 46601-1870

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and St. Joseph County Local Agency on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

**Comment 7:**

**Section D.2 Description of CVD Units and Flares.** The same changes to the description of the CVDs and the flares as described earlier in reference to Condition A.2(b) and (c) also apply here.

**Response 7:**

The source description of Section D.2 (renumbered to Section D.1) shall be amended as requested.

#### SECTION D.1 FACILITY OPERATION CONDITIONS - CVD Units

- (a) ~~Twenty-one (21) chemical vapor deposition (CVD) units, also known as carbon vapor deposition units (ID Nos. CVD-1 through CVD-21).~~
- (b) ~~Twenty-one (21) new enclosed flares, controlling VOC emissions from CVD-1 through CVD-21, with each unit having a rated capacity of 5.5 million British thermal units per hour, natural gas combustion, and emissions exhausted through stacks S-FL-1 through S-FL-21, respectively.~~
- (a) **One (1) chemical vapor deposition (CVD) unit, also known as carbon vapor deposition unit, identified as CVD-1, having an estimated batch capacity of 2400 pounds (initial weight) of brakes and a total reactant gas flow rate of 360 scf per soak hour. One (1) enclosed flare, controlling the soak phase VOC emissions from CVD-1, with a rated capacity of 0.9 million British units per hour, natural gas combustion, and emissions exhausted through stack S-FL-1.**
- (b) **Twenty (20) chemical vapor deposition (CVD) units, also known as carbon vapor deposition units, identified as CVD-2 through CVD-21, with each unit having an estimated batch capacity of 8800 pounds (initial weight) of brakes for random fiber process or 5300 pounds (initial weight) of brakes for non-woven process, and a nominal total reactant gas flow of 2000 scf per soak hour for random fiber process or a nominal total reactant gas flow of 4200 scf per soak hour for non-woven fiber process.**
- (c) **Twenty (20) enclosed flares, controlling the soak phase VOC emissions from CVD units 2 - 21, with each unit having a rated capacity of 5.5 million British thermal units per hour, natural gas combustion, and emissions exhausted through stacks S-FL-2 through S-FL-21.**

The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

#### Comment 8:

**Condition D.2.1, BACT Condition.** Our permit application did not request that the VOC destruction efficiency be amended from 98% to 99%, and we would request that the modified permit retain the 98% VOC destruction efficiency as BACT and as previously determined. We know of no basis for re-opening the BACT determination as part of this permit modification. Also we request that the permit note that the limit is 39 tons/yr for VOCs using language similar to the current permits.

#### Response 8:

The efficiency of Condition D.2.1 (renumbered to D.1.1) shall be amended as follows because the specified 98% efficiency yields after controls VOC emissions of 25.09 tons/yr which is below the significant level of 40 tons VOC/year. In addition, the requested references to 39 tons VOC/yr, as found in the previous permits, shall be added.

#### D.1.1 BACT Condition [326 IAC 8-1-6]

Enclosed flares have been accepted as BACT for control of the VOC emissions from CVD units 1 - 21. All exhaust process gas from the soak phase of each CVD unit's cycle shall be directed through the enclosed flares for VOC control. Each enclosed flare shall operate at all times that the corresponding CVD unit is operating in the soak phase and shall achieve an overall control efficiency of 998% with a maximum VOC emission rate of 0.23 pounds of VOC per million British thermal units (MMBtu) of process gas combusted by the flares. **This limitation is equivalent to 25.09 tons VOC emitted per year from CVD units 1 - 21 combined, based on average heat content of the process gases being 713 Btu per cubic foot for CVD units 1 - 21 and the maximum reactant gas inputs for each unit.**

#### Comment 9:

**Condition D.2.4, Stack Testing.** Stack tests for both the old and new burner designs have been recently conducted and witnessed by IDEM. The results from these tests have been submitted to the agency. These tests demonstrated compliance with the proposed limits. As such, we do not believe that further testing is necessary. This condition should be eliminated from the permit.

In addition, Marie Luce through Ed Surla commented that Condition D.2.4 should include compliance stack tests for representative CVD units, what type of testing needs to be performed (VOC, CO, or both), and which conditions the tests will show compliance with (D.2.1, D.2.2, or both). Also there should be a deadline for the testing to be completed.

Finally, the Office of Air Quality submitted a comment on August 28, 2001, stating that if no compliance stack testing is required at this time, the following language should be used:

"The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing."

#### Response 9:

Condition D.2.4 (renumbered D.1.4) was written with the intent to give the compliance section the authority to determine if tests are necessary, what needs to be tested, when testing shall be conducted, what methods shall be used, and how often testing needs to be required.

However, to clarify that no testing is required at this time, Condition D.1.4 shall be amended as follows:

#### D.1.4 Testing Requirements

~~(a) Compliance stack tests shall be performed utilizing methods deemed acceptable by the Office of Air Quality.~~

**No compliance stack tests shall be required of CVD units 1 - 21 at this time. However, IDEM may require compliance testing at any specific time, when deemed necessary, to determine if the CVD units are in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.**

**Comment 10:**

**Condition D.2.5(b), Monitoring.** Honeywell requests that its permits reflect the changes regarding monitoring that are ultimately made in response to the discussions between the state and the coalition

**Response 10:**

As previously stated, the CASE language referenced by Honeywell is still in the draft stage and has not been agreed upon. Thus, the CASE language will not be incorporated into the proposed permit at this time. Said CASE language may be incorporated into the Title V provided the language has been approved.

However, upon review of the monitoring requirements of permit 141-10759-00172, it is determined that the requirement of a CEM for CVD unit 21 has inadvertently been left out of the permit. Thus, Conditions D.2.5, D.2.6, and D.2.7 (now D.1.5, D.1.6, and D.1.7) shall be amended to include the excluded language.

In addition, the Table of Contents shall be amended to reflect all changes made to the proposed permit as a result of the comments submitted by the source.

**D.1.5 Monitoring**

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To assure compliance with Conditions D.1.1 and D.1.2:

- (a) The input rate of total reactant gas to each CVD unit shall be measured once per day over the entire batch cycle. To monitor the volatile organic compound (VOC) load to the control flare, the Permittee shall record the number and type of brake discs per batch.
- (b) Each enclosed flare shall have a flame present at all times that its respective CVD unit is operating in the soak phase. A thermocouple or equivalent device shall be installed and operated to monitor the presence of a pilot flame for each flare and to sound an alarm when the flame is not detected. For each CVD unit operating the non-woven process, the flare shall maintain, at a minimum, the operating temperature determined in the most recent approved stack test(s) to achieve compliance with the limits established in Conditions D.1.1 and D.1.2. In addition, a continuous monitoring system shall be installed and operated to monitor and record the operating temperature of the flare. This system shall be accurate to  $\pm 5.0$  percent and capture temperature data at least once every fifteen (15) minutes. If the operating temperature of the flare for a CVD unit operating the non-woven process drops below the minimum operating temperature, the Permittee shall take and document response steps to return the operating temperature to the required minimum level. In the event that a breakdown of the monitoring equipment occurs, the Permittee shall supplement monitoring with visual checks once per hour to ensure that a flame is present.
- (c) The Permittee shall include in its PMP a maintenance program to inspect regularly the thermocouples or equivalent devices for monitoring and recording the presence of a pilot flame, to conduct routine maintenance and calibration on such monitors, and to initiate and record appropriate response steps in the event that the monitor fails.
- (d) Pursuant to 326 IAC 3-5-1(d)(1), the Permittee shall install, calibrate, certify, operate, and maintain a continuous monitoring system for CO on the CVD-21 flare stack designated as S-FL-21 in accordance with 326 IAC 3-5-2 and 3-5-3.

- (1) The continuous emission monitoring system (CEMS) shall measure CO emission rates in pounds per hour and parts per million (ppmvd).
- (2) The CEMS shall be in operation at all times when the CVD-21 unit is operating in the soak phase.
- (3) The Permittee shall submit to IDEM, OAQ, within ninety (90) days after monitor installation, a complete written continuous monitoring standard operating procedure (SOP), in accordance with the requirements of 326 IAC 3-5-4.

## **Record Keeping and Reporting Requirements**

### **D.1.6 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain a record of the total reactant gas input to the CVDs and a log of the number and type of brake discs per batch run.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain flare temperature data for CVD units operating the non-woven process and records of response steps taken as a result of operating temperature readings below the minimum operating temperature of the flares for these units.
- (c) To document compliance with Condition D.1.5(d), the Permittee shall record the output of the CEMs and shall perform the required record keeping pursuant to 326 IAC 3-5-6, and reporting pursuant to 326 IAC 3-5-7.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.1.7 Reporting Requirements**

The Permittee shall submit a quarterly excess emissions report, if applicable, based on the continuous emissions monitor (CEM) data for CO, pursuant to 326 IAC 3-5-7. These reports shall be submitted within thirty (30) calendar days following the end of each calendar quarter and in accordance with Condition C.18 - General Reporting Requirements of this permit.

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## **Modification Certification Report**

### **Comment 11:**

**Technical Support Document.** Honeywell also notes that the TSD has a significant amount of information regarding the permitting history of this facility and regarding emission data and calculations. Honeywell is concerned that much of this information is not necessary and, due to the volume of information in the TSD, some information is simply incorrect. For example, the BACT for the flares is 98% and not 99%. Another example is the information in the TSD regarding hazardous air pollutants, when such pollutants are not being addressed in the permit. As a result Honeywell requests the TSD be revised to reflect information focused on this permit. Further, to the extent any of the emission data or other descriptive information is out-dated or otherwise inaccurate, Honeywell objects to such information.

### **Response 11:**

The lengthy history of the TSD is integral in determining the limitations, requirements, the status of the proposed modification. The modification proposed by Honeywell International, Inc. included a request for modifications to existing permits 141-11205-00172 and 141-10759 to allow CVD units 3, 7, 8, 9, and 11 to operate utilizing non-woven processing. Since these units were limited to random only, the permit history had to be established to demonstrate that removing the random only processing condition does not trigger PSD review.

Regarding the BACT efficiency and HAP emission estimates, the efficiency has been changed and the HAP emissions are necessary to determine the level of the proposed modification as well as provide information that can be used in drafting the Title V permit.

Thus, no changes shall be made to the TSD.